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5 **Attorneys for Plaintiffs**

6  
 7 UNITED STATES DISTRICT COURT  
 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 9 (San Francisco Division)

10 SOLANO & NAPA COUNTIES  
 11 ELECTRICAL WORKERS HEALTH AND  
 WELFARE TRUST FUND; et al.,

12 Plaintiffs,

13 vs.

14 CAMERON ELECTRIC & LIGHTING  
 DESIGN, a sole proprietorship; ZACHARY  
 15 ALAN CAMERON, its owner;  
 16 CAMERSON ELECTRIC dba CAMERON  
 ELECTRIC & LIGHTING DESIGN,

17 Defendants.

18 Case No. C-07-04111 VRW

19  
**DECLARATION OF MARK H. LIPTON  
 IN SUPPORT OF POINTS AND  
 AUTHORITES IN SUPPORT OF  
 MOTION FOR DEFAULT JUDGMENT  
 AGAINST DEFENDANTS CAMERON  
 ELECTRIC & LIGHTING DESIGN AND  
 ZACHARY ALAN CAMERON**

20 [F.R.C.P. Rule 55(a)]

21 Date: April 10, 2008  
 Time: 2:30 p.m.  
 Courtroom: 8, 4<sup>th</sup> Floor  
 Location: 280 South First Street  
 San Jose, CA 95113  
 Judge: Hon. James Ware

**DECLARATION OF MARK H. LIPTON**

I, MARK H. LIPTON, declare and state:

1. I am an attorney at law, licensed to practice before all of the courts of the State of  
 2 California and a member of the bar of this Court. I am not a party to this action. I am employed  
 3 by the Solano-Napa Counties Electrical Workers' Pension Plan, which serves as collection and  
 4 disbursement agent for all of the above trusts as well as the other funds listed as Plaintiffs in this  
 5 action, as Trust counsel. My duties include overseeing the collection of delinquent employer  
 6 contributions accruing based on obligations Defendants CAMERON ELECTRIC & LIGHTING  
 7 DESIGN and ZACHARY ALAN CAMERON incurred under collective bargaining agreements to  
 8 which Cameron was signatory. (*See* Letter of Assents attached to the Complaint as Exhibits "A"  
 9 and "B"). Those agreements are the Residential Agreement – Northern California Bay to the  
 10 Borders Agreement and the Inside Construction Agreement (also known as the Inside Wireman's  
 11 Agreement). (*See* collective bargaining agreements, respectively attached to the Complaint as  
 12 Exhibits "C" and "D"). I make the following declaration based upon my knowledge, except as to  
 13 those matters which are herein stated on information and belief, and as to those matters, I believe  
 14 them to be true. If called as a witness, I can and would testify competently thereto.

2. Under the various Solano-Napa Counties Electrical Workers' Trust Agreements  
 20 (Health and Welfare, Pension, Joint Apprenticeship and Training) to which Defendant ZACHARY  
 21 ALAN CAMERON, individually and dba CAMERON ELECTRIC & LIGHTING DESIGN  
 22 (hereinafter collectively referred to as "Cameron") agreed to be bound, late payments are subject to  
 23 a liquidated damages charge. This charge is equal to 10% of all contributions that are delinquent.  
 24 Payments are due postmarked on or before the 15th of the month following the month when the  
 25 work was performed. Payments are deemed delinquent if both the Employer's Report of  
 26  
 27

1 Contribution ("ERC" or "transmittal") and contributions owed thereupon are not postmarked on or  
 2 before the 15th of each month for all work performed in the preceding month. Liquidated  
 3 damages are increased to 20% upon referral to collection counsel. The funds are also entitled to  
 4 interest on unpaid principal. In order to expedite the computation of the damages owed in this  
 5 case and obtain a Judgment as expeditiously as possible, the final damages figure in paragraph six  
 6 below only calculates liquidated damages at 10% and does not include any pre-judgment interest.  
 7 This results in a savings to the Defendants.

9       3. Commencing on or before January 1, 2007, I began interfacing directly with Mr.  
 10 Zachary Cameron as well as his independent bookkeeper, Ms. Lorraine McCreedy. At that time  
 11 Cameron was significantly behind in fringe benefit contribution payments under the Residential  
 12 Agreement – Northern California Bay to the Borders Agreement (attached as Exhibit C to the  
 13 Complaint) as well as the Inside Wireman's Agreement (attached as Exhibit D to the Complaint).

15       4. By the end of September 2007, I had received all of Cameron's transmittals from  
 16 January 1, 2007 through August 31, 2007. I then applied all credits based on payments made by  
 17 Cameron to that time period. I also collected \$19,000.00 from a third-party based on mechanic's  
 18 lien. There was, at that time, \$32,330.00 due on the Residential Agreement and \$28,787.00 on the  
 19 Inside Agreement. Total due was therefore \$61,117.00 excluding liquidated damages and interest  
 20 which were an additional \$12,234.00. I then instructed Lorraine McCreedy to send me all  
 21 transmittals thereafter directly.

23       5. The amounts that accrued thereafter were as follows based on transmittals sent me  
 24 by Lorraine McCreedy.

25                   Inside Wireman Agreement:

26                   October 2007	\$13,770.00
27                   November 2007	\$ 7,666.11
December 2007	\$ 6,789.36

1  
2       Residential Agreement:

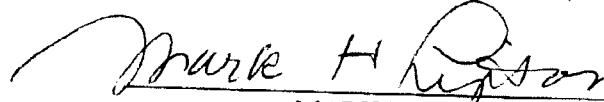
3           October 2007	\$ 4,000.49
3           November 2007	\$ 1,873.91

4           The total owed for October 2007 through December 2007 reporting period was therefore  
 5       \$34,099.87. The total accrued for the year was \$61,117.00 + \$34,099.87 = \$95,216.87. I have  
 6       collected since then \$15,419.95 from D.A. Pope and \$25,508 from Peacock Construction, both  
 7       general contractors. There was also an additional \$6,819.80 of liquidated damages due.  
 8

9       6.       As of December 31, 2007 the balance still due and owing on unpaid contributions,  
 10      excluding liquidated damages and interest, was \$54,288.92 and liquidated damages were  
 11      \$9,526.50 using the ten percent rate, instead of twenty percent allowed per the agreements. The  
 12      liquidated damage figure is greater than twenty percent of the outstanding principal because of the  
 13      various third-party amounts described above that have been applied to delinquent principal  
 14      amounts. (A true and correct copy of the transmittals from July 2007 through December 2007 are  
 15      attached hereto as Exhibit "A"). Cameron also owes additional attorneys fees and costs as  
 16      itemized in the Declaration of Scott M. De Nardo, filed concurrently herewith. This amount  
 17      captures only what is currently known to be owing as of December 31, 2007 and does not include  
 18      any unknown, additional sums, such as additional hours based upon January hours.  
 19

20  
 21       7.       On February 13, 2008, I conducted a search of the United States Servicemembers  
 22      Civil Relief Act database, located at the following website and determined that Defendant Zachary  
 23      Cameron is not an active duty service member: <https://www.dmdc.osd.mil/scra/owa/home>.  
 24      Furthermore, based upon my prior conversations with Cameron, he is neither an infant nor  
 25      incompetent.  
 26

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 14<sup>th</sup> day of February 2008 at Roseville, California.

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4 MARK H. LIPTON  
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NEYHART,  
ANDERSON,  
FLYNN &  
GROSBOCK  
ATTORNEYS AT LAW

-5-

LIPTON DCN I/S/O MOTION FOR DEFAULT JUDGMENT AGAINST DEF. CAMERON ELECT. & CAMERON  
Case No. C-07-04111 VRW

**EXHIBIT A**

**Local 180 Solano Napa Inside Wiremen  
Employee Benefits Report**

Print

**Employer's Name, Address and Identification Number:**

Metan Electric  
123rd St  
P.O. Box 94559  
Employer ID #0180NW1500

Mail this transmittal along with payment to:  
Local 180 Solano Napa Inside Wiremen  
PO Box 1320  
Suisun City, CA 94585

**Employer's Federal Reg. No.:**  
56-7592445

**Total Number of Employees Employed This Period:**  
6

1/2007 ← This report covers all Payroll Periods ending during the Month Shown

**NECA Member, No.**

SSN	Last Name	First Name	Class	401(a) Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
1815 Brazil	Rick	Rick	A	1	74.5	\$2,973.18	\$2,973.18	\$20.02	\$183.29	
0032 Buxton	Braden	Braden	A	1	177	\$3,574.39	\$3,574.39	\$18.84	\$255.86	
688 Glaze	Josh	Josh	FM	1	79.5	\$3,357.15	\$3,357.15	\$41.16	\$231.64	
457 Leon-Guerrero	Steven	Steven	JM	C	142	\$5,147.50	\$5,147.50	\$36.25	\$382.81	
489 Pirozzi	Dario	Dario	JM	A	2	193	\$7,528.64	\$7,722.54	\$38.25	\$301.95
43 Triola	Paul	Paul	FM	C	2	141	\$5,742.08	\$8,306.08	\$40.16	\$406.56
<b>Totals →</b>						807	\$28,423.84	\$29,845.34		\$1,852.11

NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS  
to check payable to NEBF and mail with 2 copies) to:  
SOUTHERN CALIFORNIA CHAPTER, NECA  
1 Village Parkway  
In., CA 94588

→ \$895.36

**For Administrator's Use Only**

Vacation/Dues (0.08 + \$0.20)	\$1,952.11
Health Insurance (\$10.11)	\$8,158.78
Pension DB (\$4.25)	\$2,877.51
Appr./Training (\$0.88)	\$554.40
LMCC (\$0.16)	\$121.06
NLMCC (\$0.01)	\$8.08
CAF (0.0133)	\$356.84
ECT (0.01)	\$208.48
401(a) (Variable)	\$1,213.50
VEBA (Variable)	\$834.00
<b>Total Due →</b>	<b>\$15,714.84</b>

*July Inside*

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**Bay to the Borders Residential Agreement**  
**Employee Benefits Report**

Print**) Employer's Name, Address and Identification Number:**

American Electric  
 3 Coombs Street  
 Suite A-3  
 Santa Clara CA 95051  
 Employer ID #B2BRA3500

1/31/2007 ← This report covers all Payroll Periods  
 ending during the Month Shown

Employer's Federal Reg. No.:  
 56-7592445

Mail this transmittal along with payment to:  
**Bay to the Borders Residential Agreement** Total Number of Employees  
 PO Box 1320 Employed This Period:  
 Suisun City, CA 94586 2

**NECA Member: No.**

SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
03496	Hillman	Nathan	JM	Napa (180)	175	\$4,759.04	\$27.04	\$320.54
5702	Thompson	Wayne	50	Napa (180)	156	\$2,824.23	\$13.52	\$200.65
				<b>Totals →</b>	331	<b>\$7,583.27</b>		<b>\$521.19</b>

**For Administrator's Use Only**

180	340	551	Totals
Vacation/Dues (0.06 + \$0.20)	\$521.19 (0.06 + \$0.20)	\$0.00 (0.06 + \$0.20)	\$0.00 \$521.19
Health Insurance (\$6.35)	\$2,101.86 (\$6.35)	\$0.00 (\$6.35)	\$0.00 \$2,101.86
Pension DB (\$1.25)	\$413.75 (\$1.25)	\$0.00 (\$1.25)	\$0.00 \$413.75
Appr./Training (\$0.68)	\$225.08 (\$0.68)	\$0.00 (\$0.68)	\$0.00 \$225.08
NEBF (0.03)	\$227.50 (0.03)	\$0.00 (0.03)	\$0.00 \$227.50
LMCC (\$0.15)	\$49.65 (\$0.15)	\$0.00 (\$0.15)	\$0.00 \$49.65
NLMCC (\$0.01)	\$3.31 (\$0.01)	\$0.00 (\$0.01)	\$0.00 \$3.31
CAF (0.01)	\$75.83 (0.01)	\$0.00 (0.01)	\$0.00 \$75.83
ECT (0.01)	\$75.83 (0.01)	\$0.00 (0.01)	\$0.00 \$75.83
401(a) (Variable)	\$0.00 (Variable)	\$0.00 (Variable)	\$0.00 \$0.00
VEBA (Variable)	\$0.00 (Variable)	\$0.00 (Variable)	\$0.00 \$0.00
<b>Total Due → \$3,683.99</b>			

July Residential

**Local 180 Solano Napa Inside Wiremen  
Employee Benefits Report**

Print

**(B) Employer's Name, Address and Identification Number:**

Cameron Electric  
2412 3Rd St  
Napa CA 94559  
Employer ID #0180IW1500

8/31/2007 ← This report covers all Payroll Periods ending during the Month Shown

Mail this transmittal along with payment to:  
Local 180 Solano Napa Inside Wiremen  
PO Box 1320  
Suisun City, CA 94588

Employer's Federal Reg. No.:  
56-7592445

Total Number of Employees Employed This Period:  
4

NECA Member: No

SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
5032 Buxton	Brennen	Braden	S7	B	2	178	\$3,373.25	\$3,618.25	\$19.87	\$264.70
0457 Leon-Guerreron	Steven	Steven	JM	JM	1	200	\$7,250.00	\$7,850.00	\$36.28	\$511.00
4489 Pirozzi	Dario	Dario	JM	A	2	66	\$3,561.28	\$3,650.28	\$38.24	\$236.82
5143 Triola	Paul	Paul	S1	C	2	187	\$8,305.12	\$8,933.12	\$16.02	\$447.88
<b>Totals →</b>				<b>624</b>	<b>\$20,489.68</b>	<b>\$22,251.88</b>				<b>\$1,459.81</b>

**(12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS**

(Make check payable to NEBF and mail with 2 copies) to:  
NORTHERN CALIFORNIA CHAPTER, NECA  
8300 Village Parkway  
Dublin, CA 94568

→ **\$667.88**

For Administrator's Use Only		
Vacation/Dues	(0.08 + \$0.20)	\$1,459.81
Health Insurance	(310.11)	\$6,308.64
Pension DB	(\$4.25)	\$2,662.00
Appr./Training	(\$0.68)	\$549.12
LMCC	(\$0.15)	\$29.80
NLMCC	(\$0.01)	\$6.24
CAF	(0.0133)	\$295.95
ECT	(0.01)	\$222.51
401(a)	(Variable)	\$1,462.80
VEBA	(Variable)	\$424.00
<b>Total Due →</b>		<b>\$13,474.77</b>

## Marana Benefits Report

Page 1 of 1

**Bay to the Borders Residential Agreement**  
Employee Benefits Report

(B) Employer's Name, Address and Identification Number:				Employer's Federal Reg. No.:				
Cameron Electric 68 Coombs Street Suite A-3 Napa CA 94559 Employer ID #B29RA3500				56-7692446				
				Mail this transmittal along with payment to: <b>Bay to the Borders Residential Agreement</b> PO Box 1320 Suisun City, CA 94583				
8/31/2007 ← This report covers all Payroll Periods ending during the Month Shown				Total Number of Employees Employed This Period: 2				
				NECA Member: No				
SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
3498 Hillman	Nathan	JM		Napa (180)	87	\$1,611.68	\$27.04	\$122.10
5702 Thompson	Wayne	SO		Napa (180)	248.5	\$5,338.94	\$13.52	\$370.04
				<b>Totals →</b>	315.5	<b>\$7,150.62</b>		<b>\$492.14</b>

For Administrator's Use Only						
	180		340		551	Totals
Vacation/Dues	(0.06 + \$0.20)	\$492.14	(0.06 + \$0.20)	\$0.00	(0.06 + \$0.20)	\$0.00
Health Insurance	(\$6.35)	\$2,003.43	(\$6.35)	\$0.00	(\$6.35)	\$0.00
Pension DB	(\$1.25)	\$394.38	(\$1.25)	\$0.00	(\$1.25)	\$0.00
Appr./Training	(\$0.68)	\$214.54	(\$0.68)	\$0.00	(\$0.68)	\$0.00
NEBF	(0.03)	\$214.52	(0.03)	\$0.00	(0.03)	\$0.00
LMCC	(\$0.15)	\$47.33	(\$0.15)	\$0.00	(\$0.15)	\$0.00
NLMCC	(\$0.01)	\$3.16	(\$0.01)	\$0.00	(\$0.01)	\$0.00
CAF	1/0 (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00
ECT	1/0 (0.01)	\$71.51	(0.01)	\$0.00	(0.01)	\$0.00
401(e)	(Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00
VEBA	(Variable)	\$0.00	(Variable)	\$0.00	(Variable)	\$0.00
<b>Total Due →</b>						<b>\$3,512.52</b>

## Marana Benefits Report

Page 1 of 1

**Local 180 Solano Napa Inside Wiremen  
Employee Benefits Report**

(8) Employer's Name, Address and Identification Number:				Mail this transmittal along with payment to: Local 180 Solano Napa Inside Wiremen PO Box 1320 Suisun City, CA 94585				Employer's Federal Reg. No.: 58-7592445		
Cameron Electric 2412 3Rd St Napa CA 94559 Employer ID #0180IW1500								Total Number of Employees Employed This Period: 3		
9/30/2007 ← This report covers all Payroll Periods ending during the Month Shown								NECA Member: No		
SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
3032	Buxton	Brandon	67	B	2	114	\$2,074.58	\$2,359.58	\$19.87	\$164.37
0457	Leon-Guerreron	Steven	JM	C	1	196.5	\$7,250.72	\$7,840.22	\$36.25	\$508.71
6143	Triola	Paul	51	C	2	148	\$5,943.68	\$6,535.68	\$18.02	\$421.74
				<b>Totals →</b>	458.8		\$15,268.98	\$16,735.48		\$1,095.82

(12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS  
(Make check payable to NEBF and mail with 2 copies) To:  
NORTHERN CALIFORNIA CHAPTER, NECA  
6300 Village Parkway  
Dublin, CA 94568

→ \$502.06

For Administrator's Use Only		
Vacation/Dues	(0.06 + \$0.20)	\$1,095.82
Health Insurance	(\$10.11)	\$4,635.43
Pension DB	(\$4.25)	\$1,948.63
Appr./Training	(\$0.88)	\$403.48
LMCC	(\$0.15)	\$56.78
NLMCC	(\$0.01)	\$4.59
CAF	(0.0133)	\$222.57
ECT	(0.01)	\$167.36
401(a)!	(Variable)	\$1,296.20
VEBA	(Variable)	\$282.00
<b>Total Due →</b>		<b>\$10,104.86</b>

## Marana Benefits Report

Page 1 of 1

**Bay-to-the-Borders Residential Agreement**  
**Employee Benefits Report**

[Print](#)

(6) Employer's Name, Address and Identification Number:

Cameron Electric  
 88 Coombe Street  
 Suite A-3  
 Napa CA 94559  
 Employer ID #B2BRA3600

Employer's Federal Reg. No.:  
58-7592445

Mail this transaction along with payment to:  
**Bay-to-the-Borders Residential Agreement**  
 PO Box 1320  
 Sulphur City, CA 94585

Total Number of Employees  
Employed This Period:  
2

9/30/07 This report covers all Payroll Periods  
ending during the Month Shown

NECA Member: No

SSN	Last Name	First Name	Class	County/Juris. Worked In	Clock Hours	Gross Wages	Hourly Wage Rate	Vac/Dues
3498 Hillman	Nathan	JM		Napa (180)	146.00	4150.64	\$27.04	273.34
3702 Thompson	Wayne	50		Napa (180)	129.50	258.09	\$13.62	180.77
				Totals →	50	6731.72		459.11
					276			

## For Administrator's Use Only

	180	340	561	Totals
Vacation/Dues (0.06 - \$0.20)	\$492.14 (0.06 + \$0.20)	\$0.00 (0.06 + \$0.20)	\$0.00	457.11
Health Insurance	(\$8.35)	\$2,003.43 (\$6.35)	\$0.00 (\$6.35)	152.60
Pension DB	(\$1.26)	\$394.38 (\$1.26)	\$0.00 (\$1.26)	345.01
Appr/Training	(\$0.66)	\$214.54 (\$0.66)	\$0.00 (\$0.66)	167.43
NEBF	(0.03)	\$214.52 (0.03)	\$0.00 (0.03)	8.28
LMCC	(\$0.15)	\$47.33 (\$0.15)	\$0.00 (\$0.15)	41.40
NLMCC	(\$0.01)	\$3.16 (\$0.01)	\$0.00 (\$0.01)	2.76
CAF D/U	(0.01)	\$71.51 (0.01)	\$0.00 (0.01)	67.32
ECT D/U	(0.01)	\$71.51 (0.01)	\$0.00 (0.01)	67.32
401(a)	(Variable)	\$0.00 (Variable)	\$0.00 (Variable)	\$0.00
VEBA	(Variable)	\$0.00 (Variable)	\$0.00 (Variable)	\$0.00
Total Due →				\$2931.41

## Marana Benefits Report

Page 1 of 1

**Local 180 Solano Napa Inside Wiremen  
Employee Benefits Report**

[Print](#)

## (8) Employer's Name, Address and Identification Number:

Cameron Electric  
2412 3Rd St  
Napa CA 94559  
Employer ID #0180IW1500

Mail this transmittal along with payment to:  
Local 180 Solano Napa Inside Wiremen  
PO Box 1320  
Suisun City, CA 94585

Employer's Federal Reg. No.:  
58-7592445

Total Number of Employees  
Employed This Period:  
3

10/31/2007 ← This report covers all Payroll Periods  
ending during the Month Shown

NECA Member: Yes

SSN	Last Name	First Name	Class	401a Rate	VEBA Rate	Clock Hours	Reduced Gross Wages	Total Gross	Hourly Wage Rate	Vac/Dues
3032 Buxton	Brandon	Brandon	S7	B	2	221	\$4,077.97	\$4,630.47	\$19.87	\$322.03
57 Leon-Guerrero	Steven	Steven	JM	C	1	194.5	\$7,197.84	\$7,781.34	\$36.25	\$505.78
143 Triola	Paul	Paul	S1	C	2	176	\$7,068.16	\$7,772.16	\$16.02	\$501.53
<b>Totals →</b>						891.5	\$18,343.97	\$20,183.97		\$1,329.34

## (12) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS

(Make check payable to NEBF and mail with 2 copies) to:

NORTHERN CALIFORNIA CHAPTER, NECA  
6300 Village Parkway  
Dublin, CA 94568

→ \$605.52

## For Administrator's Use Only

Vacation/Dues (0.06 : \$0.24)	\$1,329.34
Health Insurance (\$10.11)	\$5,980.07
Pension DB (\$4.23)	\$2,513.88
Appr./Training (\$0.88)	\$620.52
LMCC (1.15)	\$88.72
NLMCC (\$0.01)	\$5.92
CAF (0.0100)	\$268.45
ECT (0.01)	\$201.83
401(a) (Variable)	\$1,581.30
VEBA (Variable)	\$397.00
<b>Total Due →</b>	
\$12,867.03	

# **BAY to the BORDERS**

*Residential Employee Benefits Report*

This report and payment is due by the 15<sup>th</sup> of each Calendar Month.

Name	Title	Date
<u>Edwene McRae</u>	<u>Baptizer</u>	<u>11/18/17</u>

	Rate	Total
Health Insurance	\$ 8.35 / Hour	\$ 2254.25
JATC	\$ .68 / Hour	\$ 241.47
NEBF	3% of Gross	\$ 241.36
Pension	\$ 1.25 / Hour	\$ 443.75
LMCC	\$ .15 / Hour	\$ 53.25
National LMC	\$ .01 / Hour	\$ 3.55
Vacation/Dues	6% of Gross + \$ .20 / Hour	\$ 553.76
CAF	1% of Gross	\$ 80.45
ECT	1% of Gross	\$ 80.45
NECA Dues	.06	\$ 48.17
NEIF		\$ .00
<b>TOTAL DUE</b>		<b>\$ 4000.49</b>

**International Brotherhood of Electrical Workers Local 180  
FRINGE BENEFIT REMITTANCE REPORT**

**This report is due to the Administrator's office by the 15th of each month.**

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return.

(1) Name of Company:	Cameron Electric	Employer's Federal ID	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Beleno-Napa Electrical Workers PO Box 1230 Sulphur City, CA 94585-1230 *Email the completed form to: EPR@BEWLU180.org		
Address:	2412 Third Street Napa, CA 94589	Payroll Period:			
Phone:	(707) 224-4548	December 07			
Email:	lpopcorn@sbcglobal.net	NOV 07 /	Date:	1/6/2008	*Please note Involved on check # 581200712

# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

This report is due to the Administrator's office by the 15th of each month.

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: Cameron Electric Address: 2412 Third Street Napa, CA 94559 Phone: (707) 224-4646 Email: lpopcorn@sbcglobal.net			Employer's Federal ID <b>58-7692446</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Email the completed form to: EPR@IBEWLU180.org *Please note Invoiced on check SB1200712							
			Payroll Period: <b>December 07</b>	Nov 07 Date: 1/6/2008							

(2)	(3) Last 4	(4) First Name SSN	(5) Contract-Job Class	(6) Job Date	(7) New Term Date	(8) Total Hours	(9) Gross Pay	(10) 401a Rate	(11) VEBA Rate	Vac/Dues
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<b>(12) TOTALS</b>							353.00	11,942.15	787.15	

(13) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS

Make check payable to "NEBF" and mail with a copy of the remittance to:

NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568

6368.26

NECA MEMBER y	(14) NECA Service Charge = 0.6% of Gross Earnings Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to:  NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230
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Health and Welfare	\$3,568.83
CATF	\$158.84
Pension DB	\$1,500.25
Dues	\$716.83
Vacation	\$70.00
JATC	\$264.75
Training	\$45.00
ECT	\$110.42
NLMCC	\$3.63
LNCC	\$52.85
401(a)	\$735.90
VEBA	\$0.00
<b>TOTAL</b>	<b>\$7,238.19</b>

(16) Signature	Title	Date
		1/6/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:  Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230  *Please note Invoiced on check *** **Please Email the completed form to: EPR@IBEWLU180.org ***
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**BAY to the BORDERS**  
**Residential Employee Benefits Report**

This report and payment is due by the 15<sup>th</sup> of each Calendar Month

Employer's Name, Address and Identification Number			Mail this transmittal along with payment to:			Employer's Federal Reg. No.			
Local 180	Cameron Electric 2412 Third Street Napa, CA 94559		Bay to the Borders Residential Agreement P.O. Box 5057 San Jose, CA 95150			Total Number of Employees Employed → This Period			
	Nov 2007	← This report covers all Payroll Periods ending during Month Shown					NECA → Member		
SSN		Employee Last Name	Employee First Name	Class	County Worked In	Clock Hours	Gross Weeks	Hourly Wage Rate	Vacation - Dues
519-80-3496	Hilmen	Nathan	JM	Napa 100	34	\$46.40	21.04	\$3.58	
620-78-5707	Thompson	Napa	SJ	Napa 100	12.50	254.81	3.62	18.38	
<b>TOTALS →</b>									

Name	Title	Date

	Rate	Total
Health Insurance	\$8.35 / Hour	\$107.27
JATC	\$6.88 / Hour	\$83.22
NEBF	3% of Gross	\$104.83
Pension	\$1.25 / Hour	\$20.02
LMCC	\$1.15 / Hour	\$24.37
National LMC	\$1.01 / Hour	\$16.55
Vacation/Dues	8% of Gross + \$20 / Hour	\$242.97
CAF	1% of Gross	\$34.94
ECT	1% of Gross	\$34.94
NECA Dues		\$X-7777
NEIF		5
<b>TOTAL DUE</b>		<b>\$837.91</b>

Cameron Electric  
2412 Third Street  
Napa, CA 94559

# **BAY to the BORDERS**

## *Residential Employee Benefits Report*

This report and payment is due by the 15<sup>th</sup> of each Calendar Month.

Name	Title	Date
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	Rate	Total
Health Insurance	\$6.35 / Hour	\$
JATC	\$6.68 / Hour	\$
NEBF	3% of Gross	\$
Pension	\$1.25 / Hour	\$
LMCC	\$1.15 / Hour	\$
National LMC	\$0.01 / Hour	\$
Vacation/Dues	6% of Gross + \$20 / Hour	\$
CAF	1% of Gross	\$
ECT	1% of Gross	\$
NECA Dues		\$
NEIF		\$
<b>TOTAL DUE</b>		\$

**International Brotherhood of Electrical Workers Local 180  
FRINGE BENEFIT REMITTANCE REPORT**

**This report is due to the Administrator's office by the 15th of each month.**

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return.

(1) Name of Company:	Cameron Electric	Employer's Federal ID <b>56-7592445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Bolano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Email the completed form to: EPR@BEWLU180.org
Address:	2412 Third Street Napa, CA 94569	Payroll Period: December-07	
Phone:	(707) 224-4646		
Email:	lpopcorn@sbcglobal.net	Date:	1/9/2008 *Please help by initialing on check 581200712

# International Brotherhood of Electrical Workers Local 180

## FRINGE BENEFIT REMITTANCE REPORT

This report is due to the Administrator's office by the 15th of each month.

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: Address:		Cameron Electric 2412 Third Street Napa, CA 94589	Employer's Federal ID <b>58-7582445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Email the completed form to: EPR@IBEWLU180.org						
Phone:		(707) 224-4846	Payroll Period:	December-07						
Email:		ipopcorn@sbcglobal.net	Date:	1/8/2008 *Please note invoices on check <b>581200712</b>						

(2) Last Name	(3) First Name	(3) Last 4 SSN	(4) Contract-Job Class	(5) Job Date	(6) New Term Date	(7) Total Hours	(8) Gross Pay	(9) 401a Rate	(10) VEBA Rate	(11) Vac/Dues
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**(12) TOTALS**

312.00      10,738.84      700.53

**(13) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS**

Make check payable to "NEBF" and mail with a copy of the remittance to:

NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568

6322.07

NECA  
MEMBER  
Y

**(14) NECA Service Charge = 0.8% of Gross Earnings**

Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to:

NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230

Health and Welfare      \$64.42

\$8,154.32

CATF      \$142.78

\$1,326.00

Pension DB      \$544.13

\$62.49

Vacation      \$234.00

\$40.66

JATC      \$107.38

\$3.12

Training      \$46.90

\$541.40

ECT      \$0.00

\$6,402.87

(15) The employer reporting herein certifies that it is bound by the Remitted Employee Benefit Agreement and Trust for the National Electrical Benefit Fund and agrees to make the required contributions to the Fund as provided for therein. The employer certifies having received a copy of the above Agreement. The employer certifies that the information contained in this report is a full and accurate statement of hours worked and wages earned of all employees subject to employee contributions pursuant to Article 6 of the Agreement and is either covering all such non-participating non-employees or signed employee only, except those who may be qualified pursuant to Section 6.3 of the Agreement. The employer further certifies that it is reporting on behalf of a related organization as defined in Article 6 of the Agreement, either all employees of the organization or all non-employees may be covered, except those who may be excluded pursuant to Section 6.3 of the NEBF Agreement.

(16) Signature      Title      Date  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
1/8/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:  
Local 180 Solano-Napa Electrical Workers  
PO Box 1230 Suisun City, CA 94585-1230  
\*Please note invoices on check  
\*\*Please Email the completed form to: EPR@IBEWLU180.org \*\*\*

1/8/2008 10:20 AM

MPR

# **International Brotherhood of Electrical Workers Local 180 FRINGE BENEFIT REMITTANCE REPORT**

This report is due to the Administrator's office by the 15th of each month.

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return.

(1) Name of Company:	<b>Cameron Electric</b>	Employer's Federal ID <b>56-7592445</b>	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:  <b>Local 180 Solano-Napa Electrical Workers</b> <b>PO Box 1230 Suisun City, CA 94585-1230</b>
Address:	2412 Third Street Napa, CA 94559	Payroll Period: <b>January-08</b>	
Phone:	(707) 224-4646	Date:	2/11/2008
Email:	<b>lpopcorn@sbcglobal.net</b>	*Email the completed form to: <b>EPR@IBEWLU180.org</b>	

\*Please note invoice# on check      **58120081**

Case 3:07-cv-04111-VRW Document 14 Filed 02/19/2008 Page 22 of 23  
**International Brotherhood of Electrical Workers Local 180**  
**FRINGE BENEFIT REMITTANCE REPORT**

This report is due to the Administrator's office by the 15th of each month.

IF NO Employees covered by this Trust Agreement were employed this month, please enter an "X" in the box to the left, sign and return

(1) Name of Company: Address: Phone: Email:	Cameron Electric 2412 Third Street Napa, CA 94559 (707) 224-4646 lpopcorn@sbcglobal.net	Employer's Federal ID 56-7592445	Payroll Period: January-08	PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO: Local 180 Solano-Napa Electrical Workers PO Box 1230 Suisun City, CA 94585-1230 *Email the completed form to: EPR@IBEWLU180.org Date: 2/11/2008 *Please note invoice# on check 58120081
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(2) Last Name	First Name	(3) Last 4 SSN	(4) Contract-Job Class	(5) Job Date	(6) New Term Date	(7) Total Hours	(8) Gross Pay	(9) 401a Rate	(10) VEBA Rate	(11) Vac/Dues
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**(12) TOTALS**

382.50 14,166.92 926.51

(13) NATIONAL ELECTRICAL BENEFIT FUND = 3% OF GROSS EARNINGS

Make check payable to "NEBF" and mail with a copy of the remittance to:

NEBF c/o NCC, NECA 6300 Village Parkway Dublin CA 94568

\$425.01

NECA MEMBER y	(14) NECA Service Charge = 0.6% of Gross Earnings  Mail Check payable to "Northern California Chapter, NECA" and mail with a copy of the remittance to:  NCC, NECA PO BOX 1230 SUISUN CITY CA 94585-1230	→ \$85.00
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Health and Welfare \$3,867.08

CATF \$188.41

Pension DB \$1,625.63

Dues \$850.01

Vacation \$76.50

JATC \$286.88

Training \$49.73

ECT \$141.67

NLMCC \$3.83

LMCC \$57.38

401(a) \$687.00

VEBA \$0.00

TOTAL \$7,834.12

(16) Signature

Title Date

2/11/2008

(17) PLEASE MAIL MONTHLY BENEFITS CHECK AND A COPY OF THIS TRANSMITTAL TO:

Local 180 Solano-Napa Electrical Workers

PO Box 1230 Suisun City, CA 94585-1230

\*Please note invoice# on check

58120081

\*\*\*Please Email the completed form to: EPR@IBEWLU180.org \*\*\*

**PROOF OF SERVICE BY MAIL**

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On February 19, 2008, I served the within:

**DECLARATION OF MARK H. LIPTON IN SUPPORT OF POINTS AND AUTHORITIES  
IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS  
CAMERON ELECTRIC & LIGHTING DESIGN AND ZACHARY ALAN CAMERON**

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

ZACHARY ALAN CAMERON  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

CAMERON ELECTRIC dba CAMERON ELECTRIC & LIGHTING DESIGN  
2412 3<sup>rd</sup> Street  
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on February 19, 2008, at San Francisco, California.

Judy Dunworth